

HOFLAND & TOMSHECK

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

vs.

VINCENT SULLIVAN,

Defendant.

Case No.: 2:20-cr-00299-GMN-EJY

Stipulation and Order to Continue
Change of Plea
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between JASON M. FRIERSON, United States Attorney, and KIMBERLY ANNE SOKOLICH, ESQ., Assistant United States Attorney, counsel for the United States of America, and JOSHUA TOMSHECK, ESQ., counsel for Defendant VINCENT SULLIVAN, that the Change of Plea hearing currently scheduled for May 16, 2022 at 10:00 a.m. be continued to May 16, 2022 at 2:00 p.m.

This stipulation is entered into for the following reasons:

1. This is the first Change of Plea continuance request.
2. The additional time requested herein is not sought for purposes of delay but due to scheduling conflicts of defense counsel.
3. The parties agree to the continuance.
4. The defendant is not in custody, and does not object to this continuance.

1 5. Additionally, denial of this request for continuance could result in a miscarriage
2 of justice.

3 6. For the above stated reasons, the parties agree that a continuance of the Change of
4 Plea would best serve the ends of justice in this case.
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6 DATED this 12th day of May, 2022.
7

8 Respectfully submitted,

9 HOFLAND & TOMSHECK

JASON M. FRIERSON
United States Attorney

11 /s/ Joshua Tomsheck
12 JOSHUA TOMSHECK, ESQ.
13 Counsel for Defendant
14 VINCENT SULLIVAN
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/s/ Kimberly Anne Sokolich
KIMBERLY ANNE SOKOLICH, ESQ.
Assistant United States Attorney

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FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. This is the first Change of Plea continuance request.
2. The additional time requested herein is not sought for purposes of delay but due to scheduling conflicts of defense counsel.
3. The parties agree to the continuance.
4. The defendant is not in custody, and does not object to this continuance.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
6. For the above stated reasons, the parties agree that a continuance of the Change of Plea would best serve the ends of justice in this case.

ORDER

IT IS HEREBY ORDERED, that Change of Plea currently scheduled for May 16, 2022 at 10:00 a.m. be continued to May 16, 2022 at 2:00 p.m.

DATED 12 day of May, 2022.


UNITED STATES DISTRICT JUDGE

Respectfully Submitted By:

/s/ Joshua Tomsheck

Joshua Tomsheck, Esq.
Nevada Bar No. 009210
Attorney for Defendant

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